

EXHIBIT 5

In The Matter Of:

*CHAE BROTHERS, LIMITED LIABILITY COMPANY, ET AL. v.
MAYOR AND CITY COUNCIL OF BALTIMORE, ET AL.*

ANTHONY BATTS

March 12, 2021

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1 IN THE UNITED STATES DISTRICT COURT FOR THE
2 DISTRICT OF MARYLAND
3 NORTHERN DIVISION
4 CIVIL ACTION NO.: 1:17-CV-01657-SAG

5
6 CHAE BROTHERS, LIMITED LIABILITY COMPANY
7 D/B/A FIRESIDE NORTH LIQUORS, ET AL. ,
8 PLAINTIFF,

9
10 VS.

11
12 MAYOR AND CITY COUNCIL OF BALTIMORE, ET AL.,
13 DEFENDANTS,

14 _____ /
15 VIDEOTAPED DEPOSITION OF ANTHONY BATTS

16 DATE: MARCH 12, 2021

17 REPORTER: TREY SIDENBENDER

18 PLACE: REMOTE VIDEO CONFERENCE
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1 Q -- and seek resources from the state; is that
2 accurate?

3 A Well, theoretically where I come from and what I'm
4 used to, is when you're going into mobile field force and
5 you need additional officers and what I had done prior was
6 to go to the colonel of state police, at least in the state
7 of California, the state police representative would get you
8 the resources. I also believe in -- in Maryland when I
9 needed resources prior to Freddie Gray, I went to the state
10 colonel who supplied me the resources. I did tell Dean
11 Palmere to put out a hue and cry to the entire state because
12 we need resources.

13 Q Okay. By the entire state, do you mean also other
14 counties or other police departments?

15 A I mean, every law enforcement agency within the
16 state of Maryland.

17 Q Okay. Now, if you look at [Exhibit 14](#), it says
18 that the Baltimore Police Department will prepare to conduct
19 a coordinated effort in response to possible protest
20 activity. Do you see that?

21 A Yes. I see that.

22 Q Okay. At this time, what kind of coordinated
23 response was being developed by the police department?

24 A As I stated prior or testified prior is on that
25 Sunday, I had called Palmere and told him as of Monday to

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1 put out a hue and cry because I was looking for anywhere
2 from around the area of 4,000 additional police officers to
3 -- to -- to assess us or help -- help us. Usually in my
4 mind, what I usually want is whatever the number of
5 anticipated respondents to have anywhere from two to one or
6 three to one ratio and how I have dealt with prior riotous
7 conduct and that's what I addressed with Dean Palmere. And
8 at that point, when you're able to get your numbers in, you
9 would ask for the representatives from those organizations
10 that have responded, you'd have meetings, you would stet --
11 you would set up SOPs. You would check to see what type of
12 resources they were bringing, meaning what type of weapon
13 systems that they had. You'd have to make sure that your
14 people have skills in using those weapons systems. If they
15 did not, they had to pull those weapons systems out. You'd
16 have to look at logistical concerns, feeding, radios, cars,
17 directions, guides. You'd also have to make sure that
18 everybody was on the same page with planning where people
19 would go. You'd have to uniform things in terms of numbers
20 of officers in -- in uniform squads, which we call platoons
21 and make sure -- because different police departments have
22 different numbers there. We'd have to look at squads to
23 uniform those. So it's an array of things that if you got
24 those bodies in on Monday or Tuesday, you should be bringing
25 in representatives and -- and ferreting out all those issues

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1 that may ca -- cause conflict in directing, controlling, and
2 managing those resources during a riot.

3 Q Okay. So you just testified that on, was it
4 Sunday, April 19th, you directed Dean Palmere to issue a cry
5 for help, so to speak, in an effort to get what you believed
6 was 4,000 police officers, which would be the number of
7 officers needed to address protesting, correct?

8 A To get to a number close to about 4,000 it mean --
9 it didn't mean to be that exact number. I would have taken
10 5,000 or 6,000 too.

11 Q Okay. How was Dean Palmere to make those
12 requests?

13 A The same way we do all the time. He was the
14 deputy chief in charge of operations. What we had done
15 before when I've asked for resources for -- like that, he
16 would make contact with the state police. State police
17 would then put out -- either use their own resources or put
18 out a human cry without -- within the state itself and call
19 in other agencies. If they cannot get that fulfilled within
20 that state they would go outside to other states that are
21 joining District of Columbia, Pennsylvania, any other
22 locations to get that proper number. Also, they would have
23 National Guard and National Guard would also be assets that
24 could be used too.

25 Q Okay, so at this point when Dean mal -- when

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1 you're trying to acquire a mutual aid by way of, you know,
2 4,000 or so law enforcement officers, were these requests
3 being made solely from law enforcement agency to law
4 enforcement agency?

5 A Theoretically. I don't know what Dean actually
6 did, but theoretically he would contact the colonel in
7 charge of state police and make the request. State police
8 would put the hear of cry out between -- throughout the
9 entire state and call the resources as I identified.

10 Q Okay. And you're asking for 4,000 police officers
11 because you believe internally the Baltimore City Police
12 Department does not have enough police officers to address
13 protesting; is that accurate?

14 MR. CORLEY: Objection.

15 A Not even close. Sorry.

16 Q So since it's not even close, did you also speak
17 to anyone at the City or the mayor's office to let them
18 know, hey, we're -- we're drastically understaffed. We're
19 going to need more resources at this time?

20 A I -- I don't have any independent recollection of
21 any meeting or call but the -- my normal thing was -- would
22 be to advise my bosses.

23 Q Okay. And that would include then Mayor Stephanie
24 Rawlings-Blake?

25 A At that time, my contact with the mayor was

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1 Q In addition to Dean Palmere reaching out to the
2 state, do you recall directing him to also reach out to the
3 individual counties in Maryland directly to request mutual
4 aid as well?

5 A And to go back to your previous question, what I
6 had told him, is to reach out to the state, which means all
7 the police officers, all the police departments in the
8 state, and the state police.

9 Q Okay. So you're not meaning, just only
10 communicate to the state. You're saying all police
11 departments in the state; is that accurate?

12 A I -- I had said put out a human cry and get as
13 many people and bodies as you possibly can.

14 Q Okay. Do you recall personally having any
15 discussions with chiefs for police departments in other
16 counties in Maryland?

17 A I did not. I -- de -- delegated that down to
18 Palmere.

19 Q And did Palmere report back to you how successful
20 those efforts were?

21 A I only recall Palmere coming back to me on Tue --
22 on Monday evening, saying that we had 200 officers from
23 agencies within the state.

24 Q Okay. And that would've been Monday, April 20th?

25 A Yes. Correct.

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1 Q Day after Freddie Gray's death, correct?

2 A Yes. Correct.

3 Q Okay. Now, when you heard that you received -- or
4 you were only going to receive 200 officers, was it your
5 understanding that it was not mandatory for these counties
6 in Maryland to provide you with mutual assistance?

7 A We discussed that before, and it's -- it's not
8 contractual.

9 Q Okay. And to your knowledge, at this point in
10 time, it was just police department to police department,
11 right, these requests?

12 A Correct.

13 Q To your knowledge, at this point, was the City
14 reaching out to try to help the Baltimore City Police
15 Department secure additional mutual aid, seeing that the
16 numbers coming in would be so low?

17 A Not that I'm aware of. And that's not the norm.

18 Q Okay. When you say, "That's not the norm.", what
19 do you -- what do you mean?

20 A In my -- my 30-some odd years in policing is when
21 we need assistance, we call other police departments, and we
22 get them.

23 Q Okay. But the City was aware, presumably, of the
24 numbers of officers that you were receiving being short of
25 the numbers you felt were needed; is that accurate?

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1 active when it comes to crowd control, what do you mean by
2 that?

3 A We have a lot more of it. We do a lot more mobile
4 field force incident command. As Baltimore command staff
5 would say, they haven't had a riot since 1968. And they
6 don't have a whole lot of -- they didn't have a -- a great
7 deal of experience with it.

8 Q Okay. But given your prior experience with
9 rioting and crowd control issues, would you say that you
10 were more attuned to the risk of rioting than perhaps others
11 were at the Baltimore City Police Department?

12 A I think I probably had more exposure than they
13 did.

14 Q Okay. Would you say that you were more concerned
15 about rioting actually happening in Baltimore City than
16 others at the Baltimore City Police Department?

17 A Clearly.

18 Q Okay. Would you say that --

19 MS. GROSS: Counsel, I'm going to object if you
20 keep asking for things that are outside of his
21 knowledge.

22 MR. HWANG: Would you say -- you can stay a
23 continuing objection. Would you say that you had
24 greater concerns or rioting --

25 MS. GROSS: Or you can ask questions properly

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1 because this is outside of the stuff that deposition.
2 Thank you.

3 BY MR. HWANG:

4 Q Was it your impression that you had greater
5 concerns of rioting than those at the mayor's office?

6 MR. CORLEY: Objection.

7 MS. GROSS: Objection. Can you lay a foundation?
8 I mean --

9 Q You can answer.

10 MS. GROSS: -- or you can ask whether anyone told
11 him that as opposed to you asking him to guess.

12 MR. HWANG: -- speaking objections. If you wanted
13 to make a speaking objection, we can place him in the
14 lobby.

15 MS. GROSS: We can place him in the lobby, fine.
16 Because this is getting out of control.

17 MR. HWANG: We can place them in the lobby.

18 THE WITNESS: What does that mean?

19 MR. HWANG: Just standby.

20 MS. GROSS: Just in a breakout room so we can
21 complain to each other.

22 THE WITNESS: Would you like me to go offline?

23 MR. HWANG: No. No. They're going to -- on zoom
24 they're going to place you in a different room.

25 THE WITNESS: Okay, sir.

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1 A I had the ability to ask the lieutenant -- the
2 colonel in charge of State Police, whose boss is the
3 governor, to run it up his chain and flagpole.

4 Q Okay. At that point, did you ask him to help with
5 the calling in of the National Guard?

6 A I don't recall if I asked him specifically that,
7 but when I asked for 5,000 bodies, normally, if you can't
8 get them through law enforcement, you call in the National
9 Guard.

10 Q Okay. Do you ever recall having those kind of
11 discussions with anyone at the City?

12 A I don't recall. I don't have independent
13 recollection.

14 Q Okay. Was it your understanding, at that time,
15 that the City could also request the State to send in the
16 National Guard?

17 A I don't think the -- the City can direct the
18 National Guard. I think they can go to the -- the governor
19 or somebody at the state level and ask.

20 Q Okay. Do you recall -- strike that. Your
21 understanding -- did you have an understanding at that time
22 whether there was any relation between declaring a state of
23 emergency and the National Guard coming in?

24 MR. CORLEY: Objection.

25 Q You can answer.

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1 A I don't understand the question.

2 Q Did you have an understanding, at that time,
3 during the Baltimore protests, we're talking the April of
4 2015, whether there was any relation between call --
5 declaring a state of emergency and the National Guard coming
6 in?

7 A Did I -- if I understand the question, did you --
8 are you saying that did I know that the trigger was
9 declaring a state of emergency to allow the National Guard
10 come in?

11 Q Yeah. Let's put it that way. Did you have any
12 understanding as to whether or not a state of emergency was
13 required for the national guard to come in? Or the
14 declaration of a state of emergency, that is.

15 MR. CORLEY: I'm going to object to foundation, but
16 you can answer.

17 A No. I -- I'm not -- I wasn't aware that you had to
18 have both to get them.

19 Q Okay. But you don't recall having any discussions
20 with Stephanie Robinson or with Kaliope Parthemos about the
21 National Guard coming in?

22 A I remember having a conversation with the mayor on
23 the 27th.

24 Q Okay. What about prior to that?

25 A No independent recollection.

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1 seriously?

2 A I was taking the rumors of everything seriously.

3 Q Okay. Was these -- this possibility of a
4 so-called purge, would that -- was that a particular concern
5 of yours on that day?

6 A Yes. Especially dealing with high school kids on
7 the day that Freddie Gray was being buried, I think like two
8 miles north of his high school.

9 Q If I could direct your attention to 59, produced
10 by the City as City 45302.

11 (EXHIBIT 59 MARKED FOR IDENTIFICATION)

12 A Okay.

13 Q This reflects a threat to police officers. Do you
14 recall this threat?

15 A I do. Yes.

16 Q Okay And you do recall this threat being on April
17 27, 2015?

18 A I do.

19 Q Okay. So you have Freddie Gray's funeral, you
20 have this rumors of a purge, you have this threat. April 27
21 was shaping up to be a pretty big day; would you agree?

22 A The potential was shaping up to be a pretty big
23 problem.

24 Q Okay. Was the Baltimore City Police Department
25 taking any additional steps in light of what may happen to

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1 address these rumors or concerns?

2 A I don't know when you say anymore steps. We asked
3 -- tried to start steps eight days prior to any of this
4 taken place, we reached out, we asked for resources, we
5 asked for help. We begged, we had multiple meetings, begged
6 people to come and assist, they did not. So we had to go
7 into battle with the -- what we had to do the best that we
8 can with what we had and that's what we did.

9 Q Right. So things are escalating. I mean, at this
10 point, April 27, you don't recall any discussions or
11 approaching the City saying, hey, we have an issue here. We
12 don't have enough manpower.

13 A I did approach the City at -- or, we had -- we've
14 been having that conversation during the entire time. The
15 city hall was aware that we didn't have enough resources and
16 -- and knew what was happening. They also knew that the --
17 the state police had been notified. They also knew that's
18 our norm to notify the state police and that the state
19 police responds along those lines. There's -- state police
20 did not respond. They did not give us the numbers that we
21 were asking for. Nor did they tried to give us the numbers
22 that we asked for. They also were informed they could have
23 -- they could have brought the National Guard online. They
24 were aware from the -- the Colonel. They did not bring the
25 National Guard online. I don't know what else you think we

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1 could do or you have recommendations that we could have
2 done. We've done everything that's possible. We didn't get
3 the response that was normal for me as a law enforcement
4 executive.

5 Q So if the City is aware of this, did the City
6 offered to help in any way?

7 MR. CORLEY: Objection.

8 A The City had actively come online with the EOC. I
9 do know the EOC was -- every element of the City was online,
10 every element of the City was weighing in and leaning in to
11 do this and assist.

12 Q Okay Other than activating the EOC, did the City
13 offer to help in any other way, with respect to the letter?

14 A They -- they weren't just activating the EOC.
15 They were bringing up the resources of school district, they
16 were bringing up Public Works. They were bringing up every
17 department in the city and they were informing,
18 coordinating, and were working with us and they were taking
19 a very active role in leadership on that date.

20 Q What about this specific issue of not having
21 enough law enforcement officers to address crowd control str
22 -- concerns? At this point, was the City helping in any way
23 to try to get more law enforcement officers help?

24 A I wasn't --

25 MR. CORLEY: I'm going to object to anything that

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1 doesn't involve his personal knowledge. He's not here
2 as a corporate designee.

3 MR. HWANG: That's fine.

4 A And that -- what I was going to say is I have no
5 idea what was going on at city hall, I was focused on trying
6 to get our organization in line on -- on -- in place to try
7 to address the coming issues.

8 BY MR. HWANG:

9 Q Okay. So you are personally unaware of whether
10 the City was doing anything to try to help the Baltimore
11 City Police Department and get additional law enforcement
12 officers in light of its knowledge that you guys were short?

13 A I don't -- I don't know what the City was doing as
14 far as law enforcement officers to get us online. But I
15 know the City was bringing all of its resources online to
16 help the police department.

17 Q Okay. So is that a "Yes." You're not aware of any
18 efforts by the City?

19 A Well, you said if I'm not aware of any efforts,
20 and my reply was I'm aware of efforts. It just may not have
21 been law enforcement agencies. So the City was doing
22 everything it could with its resources within the city to
23 support the police department.

24 Q My question was: Are you aware of any efforts by
25 the City to help to try to acquire more law enforcement

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1 officers by way of mutual aid from jurisdictions outside of
2 the city, in light of its knowledge that the Baltimore City
3 Police Department was short-staffed, even with leave being
4 canceled and even with the mutual aid requests that the
5 Baltimore City Police Department had made thus far?

6 A Well, I'm trying to keep up with that because
7 that's a long question with a lot of comments in that, I
8 would just say no. I'm not aware.

9 Q Now, if I could direct your attention to 60 Bates
10 stamped 46343.

11 (EXHIBIT 60 MARKED FOR IDENTIFICATION)

12 A Yes, sir.

13 Q Now, this is an e-mail chain between you and
14 someone named Drum Guy (phonetic) ; is that accurate?

15 A I have no idea. Whoever Drum Guy is.

16 Q In any event, you sent the e-mail that's included
17 in this chain on April 26, 2015 at 12:20 PM; is that
18 accurate?

19 A I'm sorry. I -- I was reading, I wasn't
20 listening. I'm sorry.

21 Q Did you -- in any event, did you send the e-mail
22 that, as part of this chain, that was sent on April 26, 2015
23 at 12:20 PM.

24 A This e-mail was sent from my computer, could have
25 been me, could have been my staff, but I think this probably

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1 I need help. Would you -- would you help? She said that
2 she would slim down her resources and come as -- assist us.
3 I had staff call Penn -- Philadelphia PD, see if they can
4 send resources and help. I called Bill Bratton in New York
5 PD, see if he can send resources and help since I wasn't
6 getting a response from the State of Maryland that I thought
7 I should. All -- all -- all of them said if they were to
8 come, they can't come in without the governor's deputizing
9 them since it's a different state. I then called the mayor
10 and said we need to declare a state of emergency to get
11 officers in. I think she made that call to the governor,
12 and that's where we were.

13 Q Okay. Do you recall at what point you called the
14 mayor to ask her to declare a state of emergency?

15 A I actually said, I think we need to declare a
16 state of emergency. I need to get these resources in if
17 they can. I think that was about 1800, I could be wrong. I
18 lost track of time. I don't -- I don't really remember.

19 Q Okay. When you say -- was this when events were
20 erupting in Mondawmin?

21 A We had -- they had -- they had moved beyond
22 Mondawmin and went southbound to Pennsylvania North and CVS
23 was broken into, looted, and set fire to and crowds started
24 to subdivide. Some said they were going down to the city
25 hall to ransack city hall. Some were pulling store owners

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1 out of stores, going westbound from that location.

2 Q When you called the mayor and asked her to declare
3 a state of emergency, how -- what did she say?

4 A She jumped on it.

5 Q Okay. Do you recall when she actually declared a
6 state of emergency?

7 A No.

8 Q If you're looking at 70, it says, "Requested
9 assets, 600 officers with riot gear, 50 prisoner transport
10 vehicles, ten armor vehicles, transport buses to mobilize
11 the 600 officers." Was that requested by the Baltimore City
12 Police Department?

13 A I don't know.

14 Q Okay.

15 A You're look -- you're reading 70?

16 Q Correct.

17 A 600 officers with riot gear, prisoner transport
18 vehicles, armored vehicles. That's probably put out as a
19 request to resources that we need, I -- I guess. I don't
20 know where that came from.

21 Q Okay. So you don't recall making that request to
22 the Office of Emergency Management?

23 A I -- I didn't make that request. As I was saying,
24 I was calling chiefs of police themselves to try to get
25 support to get to my agency.

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1 Q Okay. Do you ever recall calling anyone in -- at
2 the Office of Emergency Management asking for their help to
3 get more resources?

4 A I would think most likely someone like Ganesha
5 Martin. I was given her -- I think I -- I delegated her to
6 call Philadelphia PD and anywhere else, so they -- they may
7 have been following up with the phone calls along those
8 lines. She used to work for Bob Maloney in that area so it
9 would make sense that she probably would make that phone
10 call.

11 Q Okay. If I could direct you to 71.
12 (EXHIBIT 71 MARKED FOR IDENTIFICATION)

13 A Got it.

14 Q This is produced by the City as 12096 and this is
15 an e-mail sent at 6:20 p.m. on April 27, 2015.

16 A Yep.

17 Q Do you recall where you were around that time?

18 A This is at 6:20. Most like -- I was bouncing
19 around the police station, talk, I was in and out, I was in
20 the field, I was all over the place.

21 Q Okay. In addition to calling the mayor and asking
22 her to declare a state of emergency, do you also recall
23 asking her around that time to call the national guard or do
24 something to help facilitate calling the national guard?

25 A I -- I -- no. I surmised that when you declare a

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1 made a decision to engage the crowd. I was there for a
2 little while after that. I was going -- went back down to
3 the EOC to find out where Palmere was, to take control.
4 Between my route of leaving my diamond and getting back to
5 the TOC, the TOC, Pal -- Palmere popped up on the scene and
6 took control of the situation at Mondawmin Mall and then the
7 rest of the time I was at the TOC.

8 Q Okay. So approximately what time did you arrive
9 at the TOC?

10 A I don't know. You got to remember everything was
11 going crazy out there. I wasn't looking at the clock. If I
12 had to guess it was -- it was probably between 15:30 and
13 16:00 maybe.

14 Q Okay. And from that point on, you stayed at the
15 TOC?

16 A Yes.

17 Q Okay. At any point in time did you go -- did you
18 head over to the EOC?

19 A I -- I never went to the EOC.

20 Q Okay. While you were at the TOC, do you recall
21 the mayor ever arriving there or anyone from her staff?

22 A The -- the -- Maloney. Maloney had arrived there.

23 Q Okay. And do you recall having discussions with
24 Bob Maloney when he arrived at the TOC?

25 A Yes.

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1 Q And what discussions do you recall?

2 A He thought it was a good idea for me to go to the
3 EOC.

4 Q Did you agree with him?

5 A No.

6 Q I believe it was Bob Maloney who testified that
7 you and he had a pretty heated conversation at the TOC?

8 A Yes.

9 Q What was that heated conversation about?

10 A He had talked to me respectfully to -- that he
11 thought I should be at the EOC. He had recommended that I
12 was at the EOC. I told him that my organization is under
13 fire right now. I'm not leaving here. And we got into a
14 discussion back-and-forth and he wouldn't let it go, and so
15 I ended up yelling at him and telling him to get out of my
16 TOC.

17 Q Okay. Aside from the call to the mayor where you
18 asked her to declare a state of emergency, do you recall any
19 other conversations with the mayor that day?

20 A Say it one more time. I'm sorry.

21 Q Aside from the -- I believe you testified earlier
22 that you called the mayor on April 27, 2015 --

23 A Yes.

24 Q Monday --

25 A Yes.

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1 Q -- for here to declare a state of emergency?

2 A Yes.

3 Q Other than that, presumably telephone
4 conversation, do you recall having any other discussions
5 with the mayor that day?

6 A I -- I think the mayor and I were in contact a
7 couple other times. I just don't recall, and I don't know
8 if my mind is playing games on me, but I think we may have
9 had other calls.

10 Q Okay. What was it only by telephone? She never
11 -- you never met in person?

12 A I don't -- I don't think. I don't recall us
13 meeting in person.

14 Q Okay. And throughout the course of April 27th,
15 who was the incident commander?

16 A Melissa.

17 Q Okay. Do you recall having the same frustrations
18 on Monday, April 27 as you did on April 25th, that officers
19 were not moving fast enough and not effectuating arrests
20 quickly?

21 MR. CORLEY: Objection to form.

22 A The -- the -- when Palmere got out to Mondawmin,
23 he took control as operations guy out there. We thought we
24 had a officer that was lost at Pennsylvania North because we
25 couldn't locate him. We had people breaking into CVS. I

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1 gave him the direction, specifically on a phone call, to get
2 down there to Pennsylvania North, and he sprinted down there
3 with all of his guys sprinting down there. When they got
4 down there, they were out of breath and tired. I -- when
5 they started breaking in to pulling store owners out, what
6 he could not see -- because he couldn't see CNN and some of
7 the conversation -- is, he was trying to get his guys to
8 take over that intersection and catch their breath. And I
9 called him and told him, get moving down that -- get moving
10 down the street, because we have business owners that are
11 getting hurt, and his response was, sir, we just ran down
12 here and my guys need a second just to catch a breath.
13 We'll get moving as soon -- asap.

14 Q Okay. Where was Melissa Hyatt at this time?

15 A TOC.

16 Q Okay. So were you next to Melissa Hyatt when you
17 -- sorry, strike that. When you arrived at the TOC, Melissa
18 Hyatt was there?

19 A Yes.

20 Q Okay. What was she doing at the TOC?

21 A She was running the -- she was running the
22 response to the -- the crisis.

23 Q Okay. Do you recall -- eventually you said you
24 did -- or the Baltimore City Police Department ended up
25 getting the amount of resources that it needed after the

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1 state of emergency was declared. Do you recall from what
2 jurisdictions those resources came from, aside from the
3 National Guard and the State?

4 A They came from around the state of Maryland. All
5 -- all kinds of police organizations came from the state of
6 Maryland. Started getting resources from Pennsylvania State
7 Police, some of the agencies from Pennsylvania. Washington,
8 DC came up as I had requested from Kathleen Ranier
9 (phonetic). So they came from the -- the eastern region, as
10 far as Pennsylvania, as far as Virginia. Guys had told me,
11 basically, if you had made a big circumference, all these
12 resources came in.

13 Q Okay. Are you familiar with the Baltimore
14 Regional Emergency Assistance Compact, otherwise known as
15 BREAC?

16 A No.

17 Q Are you familiar with EMAC? E-M-A-C, which is
18 also known as the Emergency Management Assistance Compact?

19 A No.

20 Q What about MEMAC, the Maryland Emergency
21 Management Assistance Compact, if I have that correct?

22 A I'm sorry, I don't -- I'm not familiar with any of
23 the MACs.

24 MR. HWANG: Okay. Do you guys have any questions?

25 Jim or Sara or Hanna?

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1 MR. CORLEY: I do not.

2 MR. HWANG: Sara, you're still muted.

3 MS. GROSS: Okay, yes. I have a question.

4 CROSS EXAMINATION

5 BY MS. GROSS:

6 Q So briefly, was -- Mr. Batts, was there anything
7 that you requested from the City, and by the City, I mean,
8 the mayor on down -- requested assistance from the city for
9 the police department that you weren't given?

10 A No.

11 MS. GROSS: Okay. I have no questions.

12 MR. HWANG: Okay. Want to advise, Jim?

13 MR. CORLEY: Mr. Batts, you have the opportunity to
14 review your deposition prior to signing it to make sure
15 that there aren't any grammatical or spelling errors or
16 any double negatives that were -- that were misplaced,
17 or you can waive your signature at this time. Would you
18 like to review your deposition before signing it?

19 THE WITNESS: Yes, please.

20 (DEPOSITION CONCLUDED)

21

22

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COPY

307

CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF BROWARD

I, the undersigned, certify that the witness in the foregoing transcript personally appeared before me and was duly sworn.

Identification: Produced Identification



TREY SIDENBENDER

Court Reporter, Notary Public

State of Florida

Commission Expires: 08/15/2021

Commission Number: GG134817

From: Palmere, Dean <Dean.Palmere@baltimorepolice.org> on behalf of Palmere, Dean
<Dean.Palmere@BaltimorePolice.org>
Sent: Wednesday, April 22, 2015 5:09 PM EDT
To: pevans@baltimorecountymd.gov <pevans@baltimorecountymd.gov>
CC: Hyatt, Melissa R. <Melissa.Hyatt@BaltimorePolice.org>; Batts, Anthony <Anthony.Batts@baltimorepolice.org>
Subject: Mutual Aid

Pete,

I am sure that you have been monitoring the recent events unfolding in the City of Baltimore pursuant to the unfortunate death of Freddie Gray. If at all possible, the Baltimore Police Department is seeking your assistance via mutual aid from your Mobile Field Force Team Platoons for upcoming protests. The current needs are driven around the anticipation of a large protest on Thursday, April 23, 2015 w/ a (reporting time, 12:30) and Saturday, April 25, 2015 (reporting time, TBD). The reporting location for both dates will be Baltimore Police Headquarters, 2nd floor Atrium of the Annex building.

Please confirm what if any assistance you may be able to provide.

Thank you,

Dean

*Dean M. Palmere
Deputy Commissioner
Baltimore Police Department*

From: Palmere, Dean <Dean.Palmere@baltimorepolice.org> on behalf of Palmere, Dean
<Dean.Palmere@BaltimorePolice.org>

Sent: Wednesday, April 22, 2015 5:50 PM EDT

To: ggardner@howardcountymd.gov <ggardner@howardcountymd.gov>; q02095@aacounty.org <q02095@aacounty.org>

CC: Batts, Anthony <Anthony.Batts@baltimorepolice.org>

BCC: Palmere, Dean <Dean.Palmere@BaltimorePolice.org>; Ebberts, Frank <Frank.Ebberts@BaltimorePolice.org>;

Higgins, James <James.Higgins@baltimorepolice.org>

Subject: Mutual Aid Request

Chief,

On behalf of Commissioner Anthony Batts, the Baltimore Police Department is seeking your assistance via mutual aid for upcoming protests. I am sure that you have been monitoring the recent events unfolding in the City of Baltimore pursuant to the unfortunate death of Freddie Gray. If at all possible, I would like to confirm what if any assistance you may be able to provide as we are expecting a series of expanded protests in the near future.

Thank you,

Dean

*Dean M. Palmere
Deputy Commissioner
Baltimore Police Department*